

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

SHAWN DRUMGOLD,)	C.A. NO. 04-11193NG
Plaintiff)	
)	
v)	
)	
TIMOTHY CALLAHAN, ET AL.)	
Defendant(s))	
)	

MOTION IN LIMINE RE: PRIOR BAD ACTS OF WITNESSES

Now comes the Plaintiff and moves this Court to order the Defendants not to argue, produce evidence or suggest to the jury that any of the witnesses who testify in this matter

1. Will be impeached by prior criminal conviction.
2. Have been guilty of criminal conduct for which they have not been convicted, including but not limited to, the use or distribution of illegal drugs.
3. Are related to, or are friends with individuals who have been involved in criminal activity including, but not limited to, the use or distribution of illegal drugs.

In support thereof, the Plaintiff has submitted a Memorandum of Law and an Affidavit of Counsel.

Respectfully submitted,

By His Attorneys,

/s/ Michael Reilly

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